

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

NYKREDIT PORTEFØLJE ADMINISTRATION
A/S, OKLAHOMA FIREFIGHTERS PENSION AND
RETIREMENT SYSTEM, OKLAHOMA LAW
ENFORCEMENT RETIREMENT SYSTEM,
OKLAHOMA POLICE PENSION AND
RETIREMENT SYSTEM, OKLAHOMA CITY
EMPLOYEE RETIREMENT SYSTEM, POLICE
AND FIRE RETIREMENT SYSTEM OF THE CITY
OF DETROIT, Individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

PROPETRO HOLDING CORP., DALE REDMAN,
JEFFREY SMITH, IAN DENHOLM, and SPENCER
D. ARMOUR III,

Defendants.

No. MO:19-CV-217-DC

**PARTIES' UNOPPOSED MOTION FOR APPROVAL OF STIPULATION
REGARDING DEADLINES AND [PROPOSED] ORDER ADOPTING THE SAME**

The Parties, by and through their undersigned attorneys of record, request the Court to
order as follows:

STIPULATION

WHEREAS, on August 11, 2022, the Parties reached an agreement in principle to settle
this action, which they are preparing customary documentation of, and which will be subject to
the Court's approval (the "Settlement");

WHEREAS, the Parties are diligently working to finalize and document the proposed Settlement;

WHEREAS, following the finalization and completion of documentation of the Settlement, Plaintiffs will file a motion for preliminary approval of the Settlement with the Court;

WHEREAS, the Parties believe that the Settlement will be documented, and Plaintiffs will be in a position to file their motion for preliminary approval of the Settlement, in no more than 30 days;

WHEREAS, on August 8, 2022, the Court scheduled a hearing on all pending motions to take place on October 27, 2022 (the “Hearing”);

WHEREAS, in light of the proposed Settlement and Plaintiffs’ forthcoming motion for preliminary approval of the Settlement, the Parties respectfully request the adjournment at this time of all pending case deadlines and the Hearing;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, subject to approval of the Court:

1. All pending case deadlines are adjourned at this time;
2. The Hearing is adjourned at this time; and
3. Plaintiffs shall file their motion for preliminary approval of the Settlement by no later than September 22, 2022.

Dated: August 22, 2022

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

By: s/ James A. Harrod

Jeroen van Kwawegen
James A. Harrod
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 554-1400
Fax: (212) 554-1444
jeroen@blbglaw.com
jim.harrod@blbglaw.com

GRANT & EISENHOFER P.A.

Daniel L. Berger
Caitlin M. Moyna
485 Lexington Avenue
New York, NY 10017
Telephone: (646) 722-8500
Fax: (646) 722-8501
dberger@gelaw.com
cmoyna@gelaw.com

*Counsel for Plaintiffs and Lead Counsel for
the Class*

MARTIN & DROUGHT, P.C.

Gerald T. Drought
State Bar No. 06134800
Federal Bar No. 8942
Frank B. Burney
State Bar No. 03438100
Bank of America Plaza, 25th Floor 300
Convent Street San Antonio, Texas 78205
Telephone: (210) 227-7591
Fax: (210) 227-7924
gdrought@mdtlaw.com
fburney@mdtlaw.com

Liaison Counsel for Plaintiffs

HUGHES HUBBARD & REED LLP

By: s/ Kevin T. Abikoff

Kevin T. Abikoff (Texas Bar No. 24034118)
Benjamin S. Britz (admitted *pro hac vice*)
1775 I Street, NW
Washington, DC 20006
Telephone: (202) 761-4600
Fax: (202) 721-4646
Email: kevin.abikoff@hugheshubbard.com
Email: benjamin.britz@hugheshubbard.com

*Attorneys for Defendants ProPetro Holding
Corp., and Spencer D. Armour, III*

WINSTEAD PC

By: s/ Toby M. Galloway

Toby M. Galloway (Texas Bar No. 00790733)
Matthias Kleinsasser (Texas Bar No.
24071357)
300 Throckmorton Street
Suite 1700 Fort Worth, Texas 76102
Telephone: (817) 420-8200
Fax: (817) 420-8201
Email: tgalloway@winstead.com
Email: mkleinsasser@winstead.com

Attorneys for Defendant Dale Redman

BELL NUNNALLY & MARTIN LLP

By: s/ Craig M. Warner

Craig M. Warner (Texas Bar No. 24084158)
2323 Ross Avenue
Suite 1900
Dallas, Texas 75201
Telephone: (214) 740-1400
Fax: (214) 740-1499
Email: cwarner@bellnunnally.com

VEDDER PRICE LLP

Jeff J. Ansley (Texas Bar No. 00790235)
100 Crescent Ct. Suite 350
Dallas, Texas 75201

Attorneys for Defendant Ian Denholm

EDMUNDSON SHELTON WEISS PLLC

By: s/ J. Kevin Edmundson

J. Kevin Edmundson (Texas Bar No. 24044020)

Jesse Z. Weiss (Texas Bar No. 24013728)

317 Grace Lane

Suite 210

Austin, Texas 78746

Telephone: (512) 596-3058

Fax: (512) 532-6637

Email: kevin@eswpllc.com

Email: jesse@eswpllc.com

Attorneys for Defendant Jeffrey Smith

It is so ordered.

SIGNED this _____ day of _____, 2022.

HONORABLE DAVID COUNTS
UNITED STATES DISTRICT JUDGE